UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF TENNESSEE NASHVILLE DIVISION

DEMRY CROFT,)
Plaintiff,) Case No.: 3:22-cv-1026
VS.)
) Judge Eli Richardson
TENNESSEE STATE UNIVERSITY)
BOARD OF TRUSTEES,) Magistrate Judge Barbara D. Holmes
)
Defendant.)
)
)

AMENDED CASE STATUS REPORT

Pursuant to the Court's Order (Doc. 70), Defendant submits the following amended case status report that corrects an error in the prior report regarding written discovery. As explained in section (ii) below, Defendant's counsel was unable to obtain Plaintiff's consent to file this as a joint report.

(i) Update on the status of discovery taken and remaining discovery.

Defendant served interrogatories and requests for production on Plaintiff on February 14, 2024, and Plaintiff responded on March 12, 2024. Plaintiff served interrogatories and requests for production on Defendant on March 23, 2024, while this case was stayed, and Defendant responded on August 2, 2024. Defendant completed its review of electronic discovery and produced all responsive documents on September 13, 2024 and September 24, 2024. Defendant does not anticipate any further written discovery, but Plaintiff may wish to take additional written discovery. Given the upcoming holidays, the parties do not expect to be able to take depositions until early 2025.

(ii) Proposed schedule for discovery and dispositive motions.

The parties are unable to agree to a schedule at this time. Defendant's counsel has exchanged multiple emails with Plaintiff and included the dates that he proposes for the schedule below. However, Plaintiff refuses to consent to this report unless Defendant also moves its proposed dates.

Defendant's proposed schedule for discovery and dispositive motions.

a. Fact discovery

Deadline for all fact discovery – March 14, 2025.

Deadline for discovery motions – April 25, 2025.

b. Expert discovery

Deadline for Plaintiff's expert disclosures – February 3, 2025.

Deadline for Defendant's expert disclosures – April 7, 2025.

Deadline for deposing all expert witnesses – May 16, 2025.

c. Dispositive motions

Deadline for dispositive motions – July 7, 2025.

Plaintiff's proposed schedule for discovery and dispositive motions.

a. Fact discovery

Deadline for all fact discovery – September 25, 2025.

Deadline for discovery motions – October 27, 2025.

b. Expert discovery

Deadline for Plaintiff's expert disclosures – August 4, 2025.

Deadline for Defendant's expert disclosures – October 7, 2025.

Deadline for deposing all expert witnesses – November 17, 2025.

c. Dispositive motions

Deadline for dispositive motions – January 7, 2026.

Respectfully submitted,

JONATHAN SKRMETTI ATTORNEY GENERAL AND REPORTER

/s/ Jeffrey B. Cadle Jeffrey B. Cadle (BPR #37037) Assistant Attorney General Rachel A. Newton (BPR #22960) Assistant Attorney General **Education and Employment Division** P. O. Box 20207 Nashville, TN 37202-0207 Telephone: (615) 741-2472 jeffrey.cadle@ag.tn.gov rachel.newton@ag.tn.gov

Attorneys for Defendant

CERTIFICATE OF SERVICE

I hereby certify that the foregoing document was electronically served on November 1, 2024, via electronic mail upon the following:

> Demry Croft 921 Night Owl Lane Roscoe, IL 61073 demrycroft@gmail.com

> > /s/ Jeffrey B. Cadle Jeffrey B. Cadle